

## **EXHIBIT 3**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY  
RIFLE & PISTOL CLUBS, INC., et al,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Acting Attorney General of  
New Jersey, et al,

Defendants.

Civil Action No. 3:18-cv-10507-PGS-  
LHG

MARK CHEESEMAM, et al,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Acting Attorney General of  
New Jersey, et al,

Defendants.

Civil Action No. 1:22-cv-04360-PGS-  
LHG

**Declaration of Brandon Combs on  
Behalf of Firearms Policy Coalition,  
Inc. in Support of Plaintiffs' Motion  
for Summary Judgment**

BLAKE ELLMAN et al,

Plaintiffs,

v.

MATTHEW J. PLATKIN, in his official  
capacity as Acting Attorney General of  
New Jersey, et al,

Defendants.

Civil Action No. 3:22-cv-04397-PGS-  
LHG

**DECLARATION OF BRANDON COMBS ON BEHALF OF FIREARMS  
POLICY COALITION, INC. IN SUPPORT OF PLAINTIFFS' MOTION  
FOR SUMMARY JUDGMENT**

I, Brandon Combs, declare as follows:

1. I am the President of Firearms Policy Coalition, Inc. ("FPC"). In that capacity, I have knowledge of the matters set out below and I am authorized to attest to the same as a representative of FPC concerning such matters.

2. Plaintiff FPC is a nonprofit membership organization incorporated under the laws of Delaware with a place of business in Clark County, Nevada. The purposes of FPC include defending and promoting the People's rights, especially, but not limited to, the fundamental, individual Second Amendment right to keep and bear arms, advancing individual liberty, and restoring freedom. FPC serves its members and the public through legislative advocacy, grassroots advocacy, litigation and legal efforts, research, education, outreach, and other programs.

3. FPC brings this action on behalf its New Jersey resident members, including the named Plaintiffs herein, who seek to exercise their right to keep and bear common semi-automatic arms for lawful purposes in New Jersey but who are prohibited from doing so under the State's regulatory scheme being challenged herein (i.e., under "New Jersey's Ban" as defined in the First Amended Complaint).

4. Law-abiding members of Plaintiff FPC who reside in New Jersey intend and desire to, *inter alia*, acquire, receive, transport, possess, lawfully use, and dispose of various semiautomatic rifles, shotguns, and handguns labeled by the State as "assault firearms," but they are subject to, adversely affected by, and prevented from doing so under the prohibitions of New Jersey's Ban against "assault firearms."

5. But for the enactment and enforcement of New Jersey's Ban, these FPC members would forthwith, *inter alia*, acquire, receive, transport, possess, lawfully use, and dispose of such rifles, shotguns, and handguns targeted under the Ban, but they cannot and do not do so because the weapons are labeled "assault firearms" such that these members reasonably fear and face a threat of arrest, confiscation, prosecution, fine, and imprisonment in light of Defendants' enforcement of the Ban.

6. But for the enactment of this Ban, and Defendants' enforcement thereof, and the criminal penalties (and life-long ban on Second Amendment rights) associated with violations of the Ban, these members of Plaintiff FPC would exercise their right to keep and bear the banned firearms for lawful purposes, including self-defense, without the fear or risk of arrest and prosecution for engaging in constitutionally protected, lawful conduct.

7. The injuries suffered by these members are germane to the core purposes of FPC.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on September 30, 2023.

  
\_\_\_\_\_  
Brandon Combs